Comments on Vol 3 Ch 3 CA Water Plan from MCWD

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Sent: Monday, December 02, 2013 11:20 PM

To: DWR CWP Comments

Cc: Patrick Hayes [phayes@mcwd.dst.ca.us] **Attachments:** MCWD comments CA Water Pla~1.pdf (128 KB)

To Whom it May Concern,

These comments on the public draft of Volume 3, Chapter 3 of the California Water Plan Update are submitted by the Mammoth Community Water District(MCWD). In addition to the comments below, please include our attached comments as appropriate. The attached comments were provided after the deadline date for the administrative draft and were not considered in the revisions for the public draft.

Page 3-20, lines 36-37 and page 3-21, lines 1-3

MCWD has had trouble using the WUCOLS for landscape water budgets. The plant water use tables are not site specific enough for our area. In addition, our distribution area varies from about 8,000 ft to 9,500 ft in elevation with extreme microclimate variations. In addition, we are challenged by the need to retrofit large old irrigation systems, inexperienced property managers running and repairing irrigation systems on large properties, lack of incentive to implement retrofits or install new irrigation in a short irrigation season location, and the urge to green-up landscapes to attract visitors to our resort based town regardless of environmental conditions. We would also like to emphasize a need to require pressure reducing valves on all water systems to allow fixtures, including sprinkler heads, to operate at their highest water efficiency rates.

Page 3-21, lines 16-21

Our distribution area is subject to large fluctuations of population. Developments to house the transient populations create a significant irrigation demand regardless of occupancy. Some level of acknowledgement of these housing/commercial development statistics and the impacts on gpcd should be included in this paragraph. This comment also applies to page 3-22, lines 34-40.

Page 3-21, lines 23-30

Many water suppliers in our region are small and often run by volunteer effort or very limited paid staff. To help these suppliers develop and implement rate increases to support their infrastructure and operations would likely require direct assistance as opposed to only supplying information. Having staff available to provide support for utilities desiring to implement rate changes and providing financial support for rate studies would greatly help these small water suppliers. Upfront assistance to increase rates to a level that sustains the water system could decrease the dependence of small water suppliers on grant funding to repair failing and non-compliant infrastructure.

Thank you for the opportunity to review and comment on the draft California Water Plan.

Sincerely,

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